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# ASARCO

October 13, 2006

Mr. Kevin L. Rochlin  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, ECL-111  
Seattle, WA 98101

RE: Monthly Reports: No. 124, September 2006  
Operable Unit No. 02  
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Asarco is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. The report is organized to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,



Robert Miller  
Tacoma Projects Manager

Attachment (4 copies)

cc: Chung Ki Yee - Washington Department of Ecology  
Glen Vadera - CH2MHill (2 copies)  
Richard Kauffman - ATSDR c/o U.S. EPA Region 10  
Leslie Ann Rose - Citizens for a Healthy Bay



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A. *Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in September.
2. Remedial Design was completed. Asarco's Final Design Submittal – *Tacoma Upland Remediation Design – Grade and Cap Site and Breakwater Peninsula* was submitted on September 5, 2006.
3. Remedial Action activities continued.

B. *Summary of sampling, tests, and all other data received or generated by Asarco in the previous month.*

1. Outfall activities including the following:

Section 2.6.1 of the Statement of Work (SOW) requires Asarco to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm. EPA and Asarco met on April 17, 2003 to discuss monitoring at the Tacoma Smelter site. The following changes to the outfall monitoring program were agreed to on an interim basis:

Sampling at the Middle Outfall was discontinued. Flows to this outfall have been re-routed to the North Outfall. Remaining seepage out of the Middle Outfall is too low to measure and does not provide accurate water quality results. Sampling at the North and South outfalls will continue through RA. Weekly composite samples (instead of daily composite samples) will be collected at each of these outfalls during the construction season. During the winter season, outfall samples will be collected every other month. The following schedule began in May of 2003. Weekly composite samples will be collected during the following months: May-October, December, February, and April. Results for samples collected in August are attached.

2. OCF leachate is currently collected in a Baker tank for offsite disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OMMP. LCRS volumes during July/August averaged 215 gallons per day on the LCRS. This rate indicates a steady decline from 411 gallons per day at the end of July 2005 when the cover system was installed.

*B. Work Plans and other deliverables completed and submitted during the previous month.*

1. No new comments were received from EPA during the month of September.
2. Final Smelter site remediation design continued in September.
3. Remedial Action during September included the following tasks:
  - OCF construction activities:
    - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary Baker storage tank.
  - Source Area construction activities:
    - Began removal of additional materials from Stack Hill to expand the remediated area
    - Maintained erosion and surface water controls
  - Site Capping construction activities:
    - Maintained subgrade areas at the site
  - Site-wide remediation activities:
    - Continued surface water controls
    - Maintained haul roads and stockpiles onsite
  - Water Treatment System:
    - Continued to collect water in baker tank for offsite disposal

*D. Actions scheduled for the next six weeks.*

1. Asarco expects to receive comments from EPA on the following submittals:
  - Final Design Submittal – *Tacoma Upland Remediation Design – Grade and Cap Site and Breakwater Peninsula*
2. The following Remedial Action tasks are planned to continue:
  - RA Monitoring:
    - Outfall sampling (weekly composite samples) during scheduled months
  - OCF construction activities:
    - Continue collection of leachate for offsite disposal
    - Continue monitoring of leachate volumes
    - Continue to inspect lower vault for leaks
  - Source Area construction activities:
    - Erosion controls and site maintenance
    - Additional excavation of materials from Stack Hill to extend remediated area for development
  - Site Capping construction activities:
    - Continue to maintain subgrade areas at the site
  - Site-wide construction activities:
    - Continue surface water controls
    - Maintain roads and stockpiles onsite

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*E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.*

1. Group 1 Preliminary Design tasks are 100% complete; Intermediate Design is 100% complete; Final Design is about 100% complete.
2. Group 2 Preliminary Design is about 100% complete; Intermediate Design is essentially complete, Final Design is about 100% complete.
3. Surface water evaluation is complete.

*F. Modifications to work plans or schedules proposed to or approved by EPA.*

1. Schedule revisions may be necessary because the RD schedule in the Remedial Design Reports (RDRs) anticipated Consent Decree lodging in April 1996. The current RD Schedule (Final Revision 1) was prepared in September 1996 and is part of the RD Work Plan.
2. Asarco is currently working per Revision 8 of the RD schedule as discussed with EPA during the May 23, 2000 RD meeting.
3. The Second Amendment to the Consent Decree is out for public comment. The amendment is the settlement agreement negotiated between EPA, DOJ and Point Ruston for the remaining cleanup work at the Smelter site that Point Ruston will be responsible for as the purchaser of the Asarco Tacoma site.

*G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.*

1. Meetings held in August:
  - Asarco attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA activities (1<sup>st</sup> and 3<sup>rd</sup> Monday of each month).

Table 1. Summary of August 2006 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.061	12.10%	0.020	4.00%	0.015	3.00%
North Outfall	0.045	8.90%	0.030	6.00%	0.028	5.50%

\* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.